

## **REMARKS**

Applicants have reviewed this application in light of the Office Action of September 5, 2008. Claims 1–7, 9–11, and 13–19 remain pending in the application. Kindly reconsider the rejection in view of the following remarks.

Preliminarily, Applicants acknowledge the Examiner's allowance of claims 6, 7, 9–11, and 13–19 and the willingness to allow claims 2 and 3 if written in independent form including all of the limitations of their parent claims. As discussed below, applicants believe that claim 1 and claims 205 that depend therefrom are patentably distinguishable over the art of record as written.

### **35 U.S.C. 103(a) Rejection of Claim 1**

Claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2004/0203771 to Chang et al. (hereinafter "Chang") in view of U.S. Patent Publication No. 2008/0119184 to Rebo et al. (hereinafter "Rebo").

Claim 1 recites, *inter alia*, "a gateway connected to a wired network." The Examiner asserts that the Chang publication discloses a gateway in the form of elements 50 and 100. However, applicants assert that Chang does not disclose or suggest a gateway of any sort.

Those skilled in the art would recognize that a "gateway" functions to pass information between discrete networks. Local traffic, within a shared network, does not pass through the gateway, while traffic meant intended for transmission passes through the gateway. Chang defines GAN 100 as a "General ATM switch Network." See Chang, ¶21. Devices attached to such a network (such as Chang's DLR 50 or PDSN 60) communicate with one another without the use of a gateway. Chang's GAN 100 appears analogous to a physical Ethernet, with cables and switches, connecting the various devices in a LAN. In no way is a gateway required by such a network, nor is any implied by Chang's usage.

Furthermore, the DLR 50 which the Examiner calls a gateway cannot perform those functions. Applicants note that Chang does not refer to the DLR 50, or to any other device, as a gateway. In the absence of any specific disclosure that the DLR 50 constitutes a gateway, the Examiner asserts that the DLR 50 performing the functions of a gateway. In order to act as

a gateway, a device must pass information between two different networks. Chang simply describes the DLR 50 as “functioning like an HLR.” See Chang, ¶23. Chang’s DLR 50 only provides location information. In the context of a wireless communication, a HLR (i.e., a Home Location Register) comprises a database in a cellular system that contains all the subscribers within the provider’s home service area (see [publib.boulder.ibm.com/infocenter/pvcvoice/51x/topic/com.ibm.websphere.wvs.doc/wvs/glossary.html](http://publib.boulder.ibm.com/infocenter/pvcvoice/51x/topic/com.ibm.websphere.wvs.doc/wvs/glossary.html)). Thus, to the extent that the DLR 50 of Chang acts like an HLR, the DLR does not function as a gateway. Therefore, Chang fails to disclose or suggest a gateway connected to a wired network.

Rebo cannot cure the deficiencies of Chang in this respect. In particular, Rebo concerns itself solely with a wireless access points and provides no discussion of how to handle data past the access point. As a result, applicants maintain that Chang and/or Rebo, taken alone or in combination, fail to disclose or suggest a gateway connected to a wired network.

Claim 1 further recites, “a plurality of access points **associated with, and controlled by, the gateway.**” However, because Chang does not disclose or suggest a gateway, Chang cannot disclose or suggest access points which are associated with or controlled by such a gateway. The same argument applies to Rebo, which similarly fails to disclose or suggest a gateway. As a result, it is respectfully asserted that Chang and/or Rebo, taken alone or in combination, fail to disclose or suggest a plurality of access points associated with, and controlled by, a gateway.

In a similar fashion, the remaining elements of claim 1 interact with applicants’ gateway. Although the Examiner attempts to tie these elements to Chang’s DLR, the fact remains that the DLR of Chang does not act as a gateway. The present specification acknowledges, for instance, that the prior art discloses “a backend authentication server” to deal with session information. See present specification, ¶5. However, the present specification also notes that such a solution imposes a high overhead. The present invention addresses these concerns by incorporating authentication functions into the gateway itself so that authentication will not be slowed by an authentication server located in a different network segment. Neither Chang nor Rebo addresses these concerns, and neither incorporates authentication functions in a gateway.

For at least the above reasons, applicants respectfully assert that Chang and/or Rebo fail to disclose or suggest all of the elements of claim 1. Therefore, claim 1 patentably distinguishes over the art of record.

### **35 U.S.C. 103(a) Rejection of Claims 4 and 5**

Claims 4 and 5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chang in view of Rebo and further in view of U.S. Patent Publication No. 200/0046179 to Kokudo (hereinafter "Kokudo").

Claims 4 and 5 depend from claim 1 and therefore include all of claim 1's elements. Like the Chang and Rebo references, Kokudo similarly fails to disclose or suggest a gateway device which controls access points or is involved in maintaining session information. As a result, Chang, Rebo, and/or Kokudo, taken alone or in combination, fail to disclose or suggest all of the elements of claims 4 and 5. Therefore, Claims 4 and 5 patentably distinguish over the art of record.

### **Conclusion**

In view of the foregoing, applicants solicit entry of this amendment and allowance of the claims. If the Examiner cannot take such action, the Examiner should contact the applicant's attorney at (609) 734-6820 to arrange a mutually convenient date and time for a telephonic interview.

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No fees are believed due with regard to this Response. Please charge any fee or credit any overpayment to Deposit Account No. **07-0832**.

Respectfully submitted,  
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